

**CAMILLE M. ABATE, ESQ.**

ATTORNEY AT LAW

Of Counsel, Nicholas Goodman & Associates  
333 Park Avenue South, Suite 3A, New York, NY 10010  
TEL: (212) 227-9003 • FAX: (212) 937-2112  
c.abate71@gmail.com

July 20, 2023

**VIA EMAIL AND ECF**

Hon. Paul G. Gardephe  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: Request for Adjournment of Sentence**

***United States v. Dawin Brito, 15 Cr. 749 (PGG) and 13 Cr. 154 (RWS)***

Dear Judge Gardephe:

Based upon the government's sentencing submission, filed July 18, 2023 at 10:25 p.m., but which I first read this morning, I respectfully request a week's adjournment of sentence, until August 1, 2023.

The dramatic deviation from my – and more importantly, Mr. Brito's – expectations of sentence, based upon not only the government's *Pimentel* letter but also upon the Final Presentence Report of May 30, 2023, to which there had been heretofore no objections, as well as Judge Sweet's sentencing decision, require me to research and investigate the government's new analysis of the guidelines, as well as make arguments against the adoption of this new analysis.

I hope to have my response to the government's submission in by July 25.

I have spoken to AUSA Kaylan Lasky, and she has no objection to the adjournment.

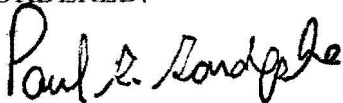
**O GO Q'GPFQTUGF <'Sentencing is adjourned to August 1, 2023 at 3:00 p.m. Defendant's supplemental submission is due by July 25, 2023.**

Sincerely,

*Camille M. Abate*

Camille M. Abate

SO ORDERED.



Paul G. Gardephe  
United States District Judge  
Date: July 20, 2023